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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

In the Matter of

Numbering Resource Optimization

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CC Docket No. 99-200

COMMENTS  
OF THE  
UNITED STATES TELECOM ASSOCIATION

The United States Telecom Association (USTA)<sup>1</sup> hereby submits its comments in response to the issues raised in the Commission's Report and Order and Further Notice of Proposed Rule Making in the above-captioned proceeding.<sup>2</sup> In that decision, the Commission adopted several measures designed to extend the life of the North American Numbering Plan (NANP), specifically related to monitoring number usage and thousand block number pooling. In addition, the Commission sought additional comment on a number of specific issues relating to the findings reached by the Commission. The Commission stated that it intends to address other optimization measures that were raised in this proceeding in future orders.

USTA offers the following comments on the specific issues raised by the Commission in the Order and Further Notice.

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<sup>1</sup> The United States Telecom Association, formerly the United States Telephone Association, is the nation's oldest trade organization for the local exchange carrier industry. USTA represents more than 1200 telecommunications companies worldwide that provide a full array of voice, data and video services over wireline and wireless networks. USTA members support the concept of universal service and are leaders in the deployment of advanced telecommunications capabilities to American and international markets.

<sup>2</sup> FCC 00-104, released March 31, 2000 (Order and Further Notice).

## 1. Utilization Threshold

The Commission determined that requiring carriers not participating in thousand block number pooling to meet a utilization threshold before they receive a new growth code would assure that carrier requests for additional numbers are needs-based.<sup>3</sup> Relying on that determination, the Commission in its Order and Further Notice adopted a nationwide utilization threshold for non-pooling carriers to become effective January 1, 2001.<sup>4</sup> However, the Commission did not adopt a specific threshold level. Rather, it seeks comment on an appropriate level.<sup>5</sup> The Commission tentatively concludes that the nationwide utilization threshold should be set at 50%, with annual 10% increases until the threshold reaches 80%, and that the threshold requirement apply to individual rate centers.<sup>6</sup>

USTA agrees that a reasonable utilization threshold for non-thousand block pooling carriers should be adopted and phased in, provided that a mechanism is established to validate that carriers, in fact, have a sufficient supply of numbers under the new scheme.

USTA believes that the test of validity should be based on a carrier having an adequate six month supply of numbers. The Commission acknowledges that a six month service provider inventory is an appropriate level in thousand block pooling situations to assure adequate and sufficient access to numbering resources.<sup>7</sup> We believe that this level

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<sup>3</sup> Order and Further Notice at ¶ 115.

<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at ¶ 248.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.* at ¶ 189.

should be applied to the threshold applicable to carriers not participating in thousand block pooling as well. In order to assure the validity of the Commission's proposal, USTA conditions its support of this threshold on preserving the right of a carrier to appeal to the North American Numbering Plan Administrator (NANPA) for additional resources if its supply of numbers falls below that needed for six months of activity. The Commission should monitor the relief activity to evaluate the industry's experience with each phase of the threshold established, *e.g.*, at 50% and again at each subsequent increase. Under no circumstances should the Commission increase the level beyond 70% until it is clear that adequate numbering resources will be available to carriers for utilization rates beyond that percentage.

USTA also is greatly concerned that the threshold level should be set based on a clear recognition of how the threshold calculation is done. The suggestions made by parties in comments to the Notice of Proposed Rulemaking in the above-captioned proceeding<sup>8</sup> were based on a numerator that included unassignable numbers beyond the sole category that the Commission now proposes to include in the numerator-- Assigned numbers.<sup>9</sup> With the adopted calculation basis of number usage adopted by the Commission in the Order and Further Notice, the validity of the previous proposals submitted in response to the Notice must be reexamined. The same threshold levels cannot be presumed to apply with the significant changes in number categories that have subsequently been adopted. USTA believes that a threshold level beyond 70% would be inappropriate with the Commission's change in categories. In any event, USTA

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<sup>8</sup> 14 FCC Rcd 10322 (1999) (Notice).

<sup>9</sup> The Commission specifically recognized this fact. Order and Further Notice at ¶ 115.

advocates that the numerator should include all numbers that the carrier whose utilization threshold is being evaluated does not have the option to assign. In order to relate back to the basis on which information was provided for the record, the numerator should include Assigned, Administrative, Intermediate, Reserved and Aging numbers. Otherwise, the specific utilization levels suggested for application must be adjusted to be relevant and meaningful. The adopted level must be adequate to assure a six month supply of numbers for the carrier, as stated above. If the threshold is unrealistically high, it will jeopardize the six month inventory level.

USTA agrees that it would be appropriate for threshold levels to be based on rate center utilization, except that it is not unusual for a single rate center to be served by multiple switches operated by a single entity.<sup>10</sup> For this reason, USTA requests that, if utilization must be done on a rate center basis, an additional provision be added so that the utilization calculation is done on a per-switch basis if a carrier operates multiple switches in a single rate center. This is because in a non-pooling scenario or even after pooling has been implemented, multiple switches cannot share numbering resources assigned to one of them,<sup>11</sup> and the need for numbering resources and, therefore, the requests for additional resources must be done on a per-switch basis.

The Commission specifically found that rate center-based utilization “more accurately reflects how numbering resources are assigned”<sup>12</sup> than NPAs. The

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<sup>10</sup> This now is the case with many large telephone companies and may also become more common among other carriers as mergers and acquisitions occur.

<sup>11</sup> USTA will request that the FCC acknowledge that even in a pooling environment, multiple switches in the same rate center should not be required to share thousands block assignments. This issue will be addressed in detail in a future USTA request related to the Order and Further Notice.

<sup>12</sup> *Id.* at ¶ 105.

Commission also found that rate center-based utilization is in concert with specific customer demands, particularly since an NPA could contain high utilization rates in densely populated areas and lower utilization rates in more rural or suburban rate centers.<sup>13</sup> In such a situation, the Commission correctly recognized that a carrier might be unable to meet an NPA-wide utilization rate, even with number shortages in rate centers with highly populated areas.<sup>14</sup> Taking this logic one step further, it may also be impossible for a carrier with multiple switches to meet a single requirement for a rate center, if multiple switches are operated within the rate center in question. For these compelling reasons, the Commission should affirm its conclusion to base utilization thresholds on each switch in a rate center.

## **2. Pricing for Numbers**

The Commission asks for further comment on pricing of numbers, particularly on how a “market-based allocation system” would affect the efficiency of allocation of numbers among carriers, particularly with the implementation of thousand block pooling.<sup>15</sup> USTA has several objections to any imposition of charges for numbering resources. Most of these public policy and legal reasons were set forth in USTA’s comments to the Notice, and they remain relevant in a thousand block pooling environment.<sup>16</sup> They all support the conclusion that the Commission cannot and should not impose a charge for numbers.

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<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

<sup>15</sup> *Id.* at ¶ 251.

<sup>16</sup> USTA Comments filed July 30, 1999, at 12-14.

First, the Commission does not have jurisdiction to charge for numbers. The Commission's authority is limited to the requirement that costs of establishing telecommunications numbering arrangements are to be borne by all carriers on a "competitively neutral basis."<sup>17</sup> Congressional authority would be required for the Commission to directly levy a charge for numbers, as it contemplates in its request for further comments on this issue.

Second, USTA is concerned about the Commission's premise that carriers are somehow getting numbers for free. This is clearly not the case. There are significant costs associated with numbers that carriers incur. These include internal administrative costs, NANPA costs, and network costs.

Third, any charge incurred by carriers for numbers would be ultimately borne by the end user. While legitimate costs should be recovered, this is one situation that can be avoided. The reasons stated by the Commission for considering imposing such a charge—improving the allocation and utilization of numbering resources—would not be achieved.

Fourth, if customers pay for numbers, the Commission must consider the effects of customer expectations of a property right in the assigned numbering resource. Even though payment by a customer would not convey such a right, the expectation acts as a deterrent to imposition of charges and must be avoided.

Additional issues must be considered, such as what happens to the embedded cost base if a customer refuses to pay for a number. Also, porting of numbers adds a complicating factor with regard to cost responsibility and recovery.

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<sup>17</sup> 47 U.S.C. § 251(e)(1); *See also* USTA Comments at 13-14.

### 3. Cost Recovery

The Commission made a number of determinations regarding recovery of carrier costs of thousand block pooling. Specifically, it adopted a cost recovery framework, including categories of pooling costs and allocation methods for costs to those categories.<sup>18</sup> The Commission also determined that pooling costs will be recovered through an exclusively federal mechanism.<sup>19</sup> Yet, surprisingly, the Commission declined to adopt specific cost recovery mechanisms for these legitimate carrier costs on the basis that it lacked “sufficient cost data.”<sup>20</sup> In light of this inaction, the Commission requests carrier cost studies that quantify shared industry and direct carrier-specific costs.<sup>21</sup> In addition, the Commission stated that it believed that cost savings would result from thousand block pooling which prolong the life of NPAs and avoid implementing additional NXX codes and that this should be taken into account in determining carrier costs.<sup>22</sup> Based on this, the Commission asks for carrier cost studies that take such purported cost savings into account.<sup>23</sup>

In fact, thousand block pooling may temporarily delay the need for code relief, but cannot avoid it. USTA and others have recommended that pooling be implemented in situations where NPAs are not already in jeopardy in order to maximize the benefit of

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<sup>18</sup> Order and Further Notice at ¶¶ 194, 201-214.

<sup>19</sup> *Id.* at ¶¶ 194-196.

<sup>20</sup> *Id.* at ¶ 214. *See also* ¶ 253.

<sup>21</sup> *Id.* at ¶¶ 214-215, 253.

<sup>22</sup> *Id.* at ¶¶ 214-215, 253.

<sup>23</sup> *Id.* at ¶¶ 214, 253.

pooling.<sup>24</sup> Most early implementations of thousand block pooling are being done in situations in which exhaust is impending; because of that, the effect of pooling introduction will be quite limited. We have not seen any effects of pooling in such situations as yet, and any delay to the need for relief can be expected to be minimal. This reduction in benefits of pooling also minimizes the cost avoidance benefits. USTA continues to advocate that the Commission adopt timely, adequate and expedient cost recovery measures for thousand block pooling.<sup>25</sup> Section 251(e)(2) of the Act requires such action. The Commission made important decisions regarding cost recovery based on the record in this proceeding. USTA maintains that the record is sufficient to reach a determination on specific cost recovery mechanisms so that carriers can begin to implement them in a timely fashion. The Commission should not further delay its decision. In addition, the Commission needs to recognize that non-pooling carriers will incur costs once thousand block pooling is implemented in LNP-capable areas, just as they do for LNP. Those costs are legitimate and a sufficient cost recovery mechanism must be implemented for such carriers as well.<sup>26</sup>

The Commission determined that carrier costs associated with state-mandated pooling trials are intrastate costs and should be recovered through state recovery

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<sup>24</sup> See, e.g., USTA Comments on Massachusetts Department of Telecommunications and Energy Request for Additional Authority to Implement Various Area Code Conservation Methods in the 508, 617, 781 and 978 Area Codes, NSD File No. L-99-19, filed April 5, 1999 at 5.

<sup>25</sup> See USTA Reply Comments at 19.

<sup>26</sup> On March 19, 1999, USTA, jointly with the National Exchange Carrier Association, Inc., National Rural Telecom Association, National Telephone Cooperative Association, and the Organization for the Promotion and Advancement of Small Telecommunications Companies, filed a Petition for Expedited Interim Waiver in CC Docket No. 95-116, seeking relief so that non-LNP-providing carriers could recover their LNP costs. The Commission has not yet acted on this petition.



mechanisms.<sup>27</sup> Based on this determination, the Commission implied that such costs should not be included in any cost studies submitted by carriers in response to the Order and Further Notice, and that they are not recoverable through any federally prescribed mechanism. USTA objects to such a determination because it will result in inadequate cost recovery for carriers and could impose an inequitable burden on certain states and customers. Specifically, we believe that such a result will be realized for several reasons. First, although individual states have been delegated authority to implement federally required pooling, no state that has or will soon implement pooling trials has made any effort to address cost recovery. There is no indication that this situation will change. Second, even if states were to begin cost recovery proceedings immediately, there is little probability that carrier tariffs would become effective in sufficient time to provide meaningful cost recovery before national pooling is implemented. Third, the Commission determined that individual state cost recovery schemes are to transition to the federal cost recovery plan when it becomes effective.<sup>28</sup> Fourth, since a significant portion of the costs incurred for pooling are one-time, region-wide costs, customers within those states that implement pooling prior to the national rollout will bear a disproportional share of the costs of pooling, if those states were to implement cost recovery mechanisms. Those costs will ultimately benefit all the states within a region.

Based on the above factors, it is not reasonable to assume that state recovery mechanisms will be adequate, or even in existence, to enable carriers to recover their pooling costs. The Commission must recognize this fact and provide adequate recovery

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<sup>27</sup> Order and Further Notice at ¶ 197.

<sup>28</sup> *Id.* at 171.

for these costs. Thus, all pooling costs should be included in a federal cost recovery mechanism.

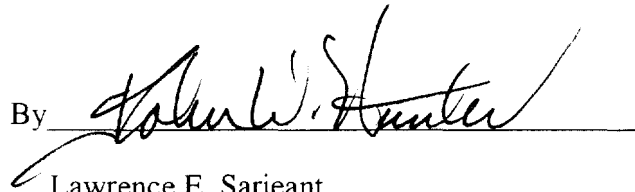
**Conclusion**

USTA requests that the Commission consider the above comments in response to the issues raised in the Order and Further Notice.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION

By

A handwritten signature in black ink, appearing to read "John W. Hunter", is written over a horizontal line.

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May 19, 2000

**CERTIFICATE OF SERVICE**

I, Meena Joshi, do certify that on May 19, 2000, Comments Of The United States Telecom Association was either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.

  
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